

PILLSBURY WINTHROP SHAW PITTMAN LLP

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*Counsel for Wilmington Trust, National Association,
as the HoldCo Revolver Loan Administrative Agent*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

**NOTICE OF WITHDRAWAL OF
WILMINGTON TRUST, NATIONAL
ASSOCIATION'S LIMITED
OBJECTION AND RESERVATION OF
RIGHTS TO DEBTORS' AND
SHAREHOLDER PROPONENTS'
JOINT CHAPTER 11 PLAN OF
REORGANIZATION**

Related Docket No: 7219

PLEASE TAKE NOTICE THAT Wilmington Trust, National Association (“**Wilmington Trust**”)¹ hereby withdraws its *Limited Objection and Reservation of Rights to Debtors’ and Shareholders Proponents’ Joint Chapter 11 Plan of Reorganization* [Doc. No. 7219] (the “**Limited Objection**”), which was filed on May 15, 2020. The Debtors’ and Shareholder Proponents’ *Joint Chapter 11 Plan of Reorganization Dated May 22, 2020* [Doc. No. 7521] (the “**Plan**”) incorporates the consensual resolution reached by the Debtors and Shareholder Proponents with Wilmington Trust and thus addresses the issues raised in the Limited Objection. To the extent the Debtors and Shareholder Proponents revise the Plan in a way that affects Wilmington Trust’s rights or the treatment of its claim, Wilmington Trust reserves its rights. By withdrawing the Limited Objection, Wilmington Trust is also withdrawing the Exhibit List [Doc. No. 7410] filed in support of the Limited Objection.

Dated: May 29, 2020

PILLSBURY WINTHROP SHAW PITTMAN LLP

By: /s/ Leo Crowley

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¹ Wilmington Trust is the successor administrative agent under that certain *Second Amended and Restated Credit Agreement* among PG&E Corporation as borrower and the agents and lenders thereunder, dated as of April 27, 2015.